

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

Kristina Garcia,

v.

Beaumont Health and Rachel Luca.

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Case No. 19-11673

Hon. Linda V. Parker

Magistrate Judge David R. Grand

**BILL OF COSTS**Judgment having been entered in the above entitled action on 10/25/2021 against Plaintiff,  
*Date*

the Clerk is requested to tax the following as costs:

CATEGORY	ATTORNEY COMMENTS	AMOUNT
A. Fees of the Clerk		
B. Fees for service of summons and subpoena		
C. Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	See Itemized Attachment A	\$2,917.48
D. Fees and disbursements for printing		
E. Fees for witnesses ( <i>itemize on page two</i> )		
F. Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case		
G. Docket fees under 28 U.S.C. 1923		
H. Costs as shown on Mandate of Court of Appeals		
I. Compensation of court-appointed experts		
J. Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828		
K. Other costs ( <i>please itemize</i> )		
TOTAL		\$2,917.48

**SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.****Declaration**

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:



Electronic service



First class mail, postage prepaid



Other:

s/ Attorney: Shannon V. LoverichName of Attorney: Shannon V. LoverichFor: Defendant Beaumont Health*Name of Claiming Party*Date: November 22, 2021

**Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)**

## NOTICE

"Sec. 1924. Verification of bill of costs."

**See also Section 1920 of Title 28, which reads in part as follows:**

**The Federal Rules of Civil Procedure contain the following provisions:**

Costs Other than Attorneys' Fees.

## RULE 6

(d) Additional Time After Certain Kinds of Service.

**RULE 58(e)**

**Cost or Fee Awards:**

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

**Attachment A**

**Kristina Garcia v. Beaumont Health, et al.  
U.S. District Court No. 19-11673**

**Deposition/Hearing Transcript Used in Support of Motion for Summary Judgment**

Deposition transcript of Kristina Garcia dated 02.04.2020 attached to Defendant's Motion for Summary Judgment as Exhibit A (*See, e.g.,* Doc #72-2, PgID 899)

Taxable items from invoice:

Transcript (Bill of Costs Handbook II.C.1.d):	\$1528.85	
(\$1148.85 <i>Transcript</i> + \$380 <i>Realtime</i> )		
Attendance (Bill of Costs Handbook II.C.1.f):	\$293.13	
Delivery/Handle/Process (Bill of Costs Handbook II.C.1.g):	\$45.19	
Copy of Transcript (Bill of Costs Handbook II.C.1.k):	\$20	
Video Pages (Bill of Costs Handbook II.C.1.i):	\$	
Litigation Support Package (Bill of Costs Handbook II.C.1.i):	\$40.00	
Exhibits (Bill of Costs Handbook II.C.1.h):	\$43.50	\$1,970.67

Deposition transcript of Kristina Garcia dated 09.22.2020 attached to Defendant's Motion for Summary Judgment as Exhibit A (*See, e.g.,* Doc #72-2, PgID 1056)

Taxable items from invoice:

Transcript (Bill of Costs Handbook II.C.1.d):	\$262.20	
Attendance (Bill of Costs Handbook II.C.1.f):	\$70.00	
Delivery/Handle/Process (Bill of Costs Handbook II.C.1.g):	\$43.83	
Copy of Transcript (Bill of Costs Handbook II.C.1.k):	\$20.00	
Video Pages (Bill of Costs Handbook II.C.1.i):	\$	
Litigation Support Package (Bill of Costs Handbook II.C.1.i):	\$40.00	
Exhibits (Bill of Costs Handbook II.C.1.h):	\$7.00	\$443.03

Deposition transcript of Antoinette Carroll dated 02.21.2020, cited to in Defendant's Motion for Summary Judgment as Exhibit D (*See, e.g.,* Doc #72-5, PgID 1143)

Taxable items from invoice:

Transcript (Bill of Costs Handbook II.C.1.d):	\$260.37	
Attendance (Bill of Costs Handbook II.C.1.f):	\$	
Delivery/Handle/Process (Bill of Costs Handbook II.C.1.g):	\$5.00	
Copy of Transcript (Bill of Costs Handbook II.C.1.k):	\$	
Video Pages (Bill of Costs Handbook II.C.1.i):	\$	
Litigation Support Package (Bill of Costs Handbook II.C.1.i):	\$	
Exhibits (Bill of Costs Handbook II.C.1.h):	\$9.00	\$274.37

Deposition transcript of Jean Aphram dated 03.13.2020, attached to Defendant's Motion for Summary Judgment as Exhibit E (*See, e.g.*, Doc #72-6, PgID 1204)

Taxable items from invoice:

Transcript (Bill of Costs Handbook II.C.1.d): \$

Attendance (Bill of Costs Handbook II.C.1.f): \$

Delivery/Handle/Process (Bill of Costs Handbook II.C.1.g): \$5.00

Copy of Transcript (Bill of Costs Handbook II.C.1.k): \$215.66

Video Pages (Bill of Costs Handbook II.C.1.i): \$

Medical/Technical Pages (Bill of Costs Handbook II.C.1.d): \$

Litigation Support Package (Bill of Costs Handbook II.C.1.i): \$

Exhibits (Bill of Costs Handbook II.C.1.h): \$8.75

\$229.41

**Total**

**\$2,917.48**

**U.S. Legal Support - Michigan**  
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**Eric J. Pelton**  
**Kienbaum Hardy Viviano Pelton & Forrest, P.L.C.**  
**280 North Old Woodward**  
**Suite 400**  
**Birmingham MI 48009**

Invoice No.	Invoice Date:	Payment Terms
110356642	2/18/2020	Due upon receipt
Job No.	Job Date:	Balance
882408	2/4/2020	\$0.00
Case Name		
Kristina Garcia vs Beaumont Health, et al		
Case No		
1911673		

Job Location	Ordered By	Reference Info.
US Legal - Lansing 306 Townsend Street Lansing MI 48933	Eric J. Pelton Kienbaum Hardy Viviano Pelton & Forrest, P.L.C. 280 North Old Woodward Suite 400 Birmingham MI 48009	Client Matter No: Claim No: Insured:

Services/Items	Units	Type	Rate	Charges
Items Covered: ORIGINAL TRANSCRIPT OF: Kristina Garcia				
Original	333.00	Pages	\$3.45	\$1148.85
Exhibit	87.00	Pages	\$0.50	\$43.50
Attendance	8.00	Hours	\$35.00	\$280.00
Attendance Before/After Hours	0.25		\$52.50	\$13.13
Litigation Support Package	1.00		\$25.00	\$25.00
Shipping	1.00		\$25.19	\$25.19
Handle/Process	1.00		\$20.00	\$20.00
Video per page	304.00	Pages	\$0.35	\$106.40
CD Package	1.00		\$15.00	\$15.00
Condensed Transcript	1.00		\$20.00	\$20.00
Tabs	17.00		\$0.55	\$9.35
Realtime	304.00		\$1.25	\$380.00
Taxable (0.00)				
Late Fees				\$312.96

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**Total Due**

**\$2086.42**

Original email sent to [myamin@khvpf.com](mailto:myamin@khvpf.com) on 02.18.2020  
 CD Bundle, Tabbed exhibits and Condensed sent via UPS Tracking  
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<b>(=) New Balance</b>	<b>\$0.00</b>

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<b>Invoice No.</b>	110356642
<b>Invoice Date:</b>	2/18/2020
<b>Total Due</b>	<b>\$0.00</b>
<b>Job No.</b>	882408
<b>Case No:</b>	1911673

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**Birmingham MI 48009**

Invoice No.	Invoice Date:	Payment Terms
110405186	10/2/2020	Due upon receipt
Job No.	Job Date:	Balance
958200	9/22/2020	\$0.00
Case Name		
Kristina Garcia vs Beaumont Health, et al		
Case No		
1911673		

Job Location	Ordered By	Reference Info.
*U.S. Legal Support - Remote Video Conference To log into this session, please utilize the link below.	Eric J. Pelton Kienbaum Hardy Viviano Pelton & Forrest, P.L.C. 280 North Old Woodward Suite 400 Birmingham MI 48009	Client Matter No: Claim No: Insured:

Services/Items	Units	Type	Rate	Charges
Items Covered: ORIGINAL TRANSCRIPT OF: Kristina Garcia, Vol II				
Original	76.00	Pages	\$3.45	\$262.20
Exhibit	14.00	Pages	\$0.50	\$7.00
RemoteDepo w/InstantExhibit - Videoconferencing	1.00		Minimum	\$0.00
Attendance	2.00	Hours	\$35.00	\$70.00
Litigation Support Package	1.00		\$25.00	\$25.00
Condensed Transcript	1.00		\$20.00	\$20.00
Shipping	1.00		\$23.83	\$23.83
Handle/Process	1.00		\$20.00	\$20.00
CD Package	1.00		\$15.00	\$15.00
VTC Pages	65.00		\$0.35	\$22.75
Video per page	65.00	Pages	\$0.35	\$22.75
Taxable (0.00)				
Late Fees				\$73.28

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**Total Due**

**\$488.53**

Condensed copy with tabbed exhibits and CD bundle sent via UPS  
 Original email sent to [myamin@khvpf.com](mailto:myamin@khvpf.com) on 10-2-20

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<b>(+) Finance Charges/Debits</b>	<b>\$73.28</b>
<b>(=) New Balance</b>	<b>\$0.00</b>

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<b>Invoice No.</b>	110405186
<b>Invoice Date:</b>	10/2/2020
<b>Total Due</b>	<b>\$0.00</b>
<b>Job No.</b>	958200
<b>Case No:</b>	1911673

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**Invoice #342912**

Date	Terms
03/06/2020	Due Upon Receipt

Assignment	Case	Billing Reference	Shipped On	Shipped Via
02/21/2020	KRISTINA GARCIA vs. BEAUMONT HEALTH and RACHEL L...		03/06/2020	None

Description	Amount
<b>Copy Transcript of ANTOINETTE CARROLL</b>	
Transcript Via E-mail	\$ 5.00
Scanned Exhibits - Repository	\$ 9.00
Copy of Transcript	\$ 260.37
	<hr/>
	\$ 274.37

Amount Due: \$ 274.37  
Paid: \$ 274.37

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**Invoice #343398**

Date	Terms
04/16/2020	Due Upon Receipt

Assignment	Case	Billing Reference	Shipped On	Shipped Via
03/13/2020	KRISTINA GARCIA vs. BEAUMONT HEALTH and RACHEL L...		04/16/2020	None

Description	Amount
<b>Copy Transcript of JEAN APHRAM</b>	
Transcript Via E-mail	\$ 5.00
Copy of Transcript	\$ 215.66
Scanned Exhibits - Repository	\$ 8.75
	<hr/>
	\$ 229.41

Amount Due: \$ 229.41  
Paid: \$ 229.41

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